

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
JONESBORO DIVISION

TRI STATE ADVANCED SURGERY  
CENTER, LLC, GLENN A. CROSBY II, M.D.,  
F.A.C.S., and MICHAEL HOOD, M.D.

PLAINTIFFS

v.

Case No. 3:14-CV-00143-JM

HEALTH CHOICE, LLC,  
and CIGNA HEALTHCARE OF TENNESSEE, INC.

DEFENDANTS

**UNOPPOSED MOTION OF DEFENDANT CIGNA HEALTHCARE OF TENNESSEE,  
INC. FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant Cigna Healthcare of Tennessee, Inc. (“Cigna”), for its Unopposed Motion for Extension of Time to Respond to Complaint, respectfully states as follows:

1. Cigna’s responsive pleading in this case is currently due on or before July 30, 2014. (ECF 6.)
2. Cigna’s co-defendant, Health Choice, LLC, has filed an unopposed motion for extension of time to respond to its complaint, seeking to extend its time to respond through September 1, 2014. (ECF 34.)
3. Counsel for the parties have agreed that as a matter of efficiency and to avoid duplication of arguments to greatest extent possible, all briefing on dispositive motions in this case should occur on the same schedule. Counsel for plaintiffs have therefore graciously agreed that Cigna should be allowed to file its responsive pleading on or before September 1, 2014.

WHEREFORE, for the foregoing reasons, Cigna respectfully requests that this Court extend its time to respond to the complaint through and including September 1, 2014.

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– and –

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**CERTIFICATE OF SERVICE**

I certify that on this 28th day of July, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

/s/ Chad W. Pekron

Chad W. Pekron